

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
ANN ARBOR DIVISION**

CASE NO.: 5:25-cv-12187

PAUL ELLEDGE,

Plaintiff,

v.

HIGHWIRE FARMS LLC,

Defendant.

COMPLAINT FOR COPYRIGHT INFRINGEMENT

(INJUNCTIVE RELIEF DEMANDED)

Plaintiff PAUL ELLEDGE by and through his undersigned counsel, brings this Complaint against Defendant HIGHWIRE FARMS LLC for damages and injunctive relief, and in support thereof states as follows:

SUMMARY OF THE ACTION

1. Plaintiff PAUL ELLEDGE (“Elledge”) brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. § 106, to copy and distribute Elledge's original copyrighted Work of authorship.

2. Paul Elledge is an award-winning photographer who's shot celebrities from Oprah Winfrey to Luciano Pavarotti. Mr. Elledge's work has appeared in People, Time, Rolling Stone, Men's Health, and numerous other publications, and he's been honored with exhibits in museums and galleries worldwide.

3. Defendant HIGHWIRE FARMS LLC (“Highwire”) is is an independently owned cannabis company offering a wide variety of products including flower, edibles, concentrates and

topicals.. At all times relevant herein, Highwire owned and operated the internet website located at the URL <https://highwirefarms.com/> (the “Website”).

4. Elledge alleges that Highwire copied Elledge’s copyrighted Work from the internet in order to advertise, market and promote its business activities. Highwire committed the violations alleged in connection with Defendant's business for purposes of advertising and promoting sales to the public in the course and scope of the Highwire's business.

JURISDICTION AND VENUE

5. This is an action arising under the Copyright Act, 17 U.S.C. § 501.

6. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

7. Highwire is subject to personal jurisdiction in Michigan.

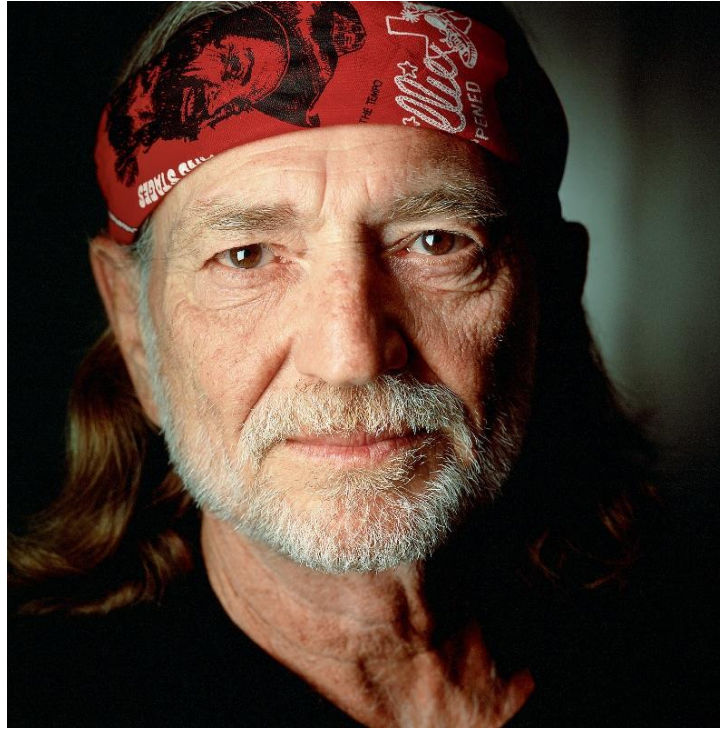
8. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, Highwire engaged in infringement in this district, Highwire resides in this district, and Highwire is subject to personal jurisdiction in this district.

DEFENDANT

9. Highwire Farms LLC is a Michigan Limited Liability Company, with its principal place of business at 840 South Main Street, Adrian, Michigan, 49221, and can be served by serving its Registered Agent, Tony Ratliff, 840 South Main Street, Adrian, Michigan 49221.

THE COPYRIGHTED WORK AT ISSUE

10. In 2007, Elledge created the photograph entitled “PaulElledge_Faces_Extroverts_35,” which is shown below and referred to herein as the “Work”.



11. Elledge registered the Work with the Register of Copyrights on June 11, 2007, and was assigned registration number VAu 749-813. The Certificate of Registration is attached hereto as **Exhibit 1**.

12. At all relevant times Elledge was the owner of the copyrighted Work at issue in this case.

INFRINGEMENT BY HIGHWIRE

13. Highwire has never been licensed to use the Work at issue in this action for any purpose.

14. On a date after the Work at issue in this action was created, but prior to the filing of this action, Highwire copied the Work.

15. On or about February 5, 2025, Elledge discovered the unauthorized use of his Work on the Website.

16. Highwire copied Elledge's copyrighted Work without Elledge's permission.

17. After Highwire copied the Work, it made further copies and distributed the Work on the internet to promote the sale of goods and services as part of its cannabis business.

18. Highwire copied and distributed Elledge's copyrighted Work in connection with Defendant's business for purposes of advertising and promoting Defendant's business, and in the course and scope of advertising and selling products and services.

19. Highwire committed copyright infringement of the Work as evidenced by the documents attached hereto as **Exhibit 2**.

20. Elledge never gave Highwire permission or authority to copy, distribute or display the Work at issue in this case.

21. Elledge notified Highwire of the allegations set forth herein on February 12, 2025 and February 28, 2025. Highwire has removed the image from the Website but has otherwise not responded to Elledge's demands.

COUNT I
DIRECT COPYRIGHT INFRINGEMENT

22. Elledge incorporates the allegations of paragraphs 1 through **Error! Reference source not found.** of this Complaint as if fully set forth herein.

23. Elledge owns a valid copyright in the Work at issue in this case.

24. Elledge registered the Work at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

25. Highwire copied, displayed, and distributed the Work at issue in this case and made derivatives of the Work without Elledge's authorization in violation of 17 U.S.C. § 501.

26. Highwire performed the acts alleged in the course and scope of its business activities.

27. Defendant's acts were willful.

28. Elledge has been damaged.

29. The harm caused to Elledge has been irreparable.

WHEREFORE, the Plaintiff PAUL ELLEDGE prays for judgment against the Defendant HIGHWIRE FARMS LLC that:

a. Highwire and its officers, agents, servants, employees, affiliated entities, and all of those in active concert with them, be preliminarily and permanently enjoined from committing the acts alleged herein in violation of 17 U.S.C. § 501;

b. Highwire be required to pay Elledge his actual damages and Defendant's profits attributable to the infringement, or, at Elledge's election, statutory damages, as provided in 17 U.S.C. § 504;

c. Elledge be awarded his attorneys' fees and costs of suit under the applicable statutes sued upon;

d. Elledge be awarded pre- and post-judgment interest; and

e. Elledge be awarded such other and further relief as the Court deems just and proper.

JURY DEMAND

Elledge hereby demands a trial by jury of all issues so triable.

Dated: July 17, 2025

Respectfully submitted,

/s/ J. Campbell Miller
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